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6 Trustee in Bankruptcy

7
8 UNITED STATES BANKRUPTCY COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION

11 In re

12 EVANDER FRANK KANE,
13 Debtor.

Case No. 21-50028 SLJ
Chapter 7
Hon. Stephen L. Johnson

**SECOND STIPULATION TO ENTRY OF
ORDER EXTENDING DATE FOR FILING
COMPLAINT
(11 U.S.C. SECTION 727)**

[No Hearing Requested]

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18 This second stipulation is entered into by and between Evander Frank Kane (“Debtor”) and
19 Fred Hjelmset, Trustee in Bankruptcy of the Debtor’s estate (“Trustee”), through their respective
20 counsel.

21 **RECITALS**

- 22 A. On January 9, 2021, the Debtor filed a Voluntary Chapter 7 Petition.
23 B. On January 11, 2021, the Bankruptcy Court issued its “Notice of Chapter 7
24 Bankruptcy Case,” Docket 4 (“Notice”).
25 C. The Notice provides that the deadline for filing complaints against the Debtor for
26 non-dischargeability or denial of discharge is April 5, 2021.

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1 D. On March 22, 2021, the Trustee caused to be filed the Stipulation to Entry of Order
2 Extending Date for Filing Complaint (11 U.S.C. Section 727) as Docket 68, which stipulation was
3 approved by the Order Extending Date for Filing Complaint Objecting to Discharge (11 U.S.C.
4 Section 727) entered March 22, 2021 as Docket 70 (the "Order"). The Order extended the deadline
5 established by Rule 4004 of the Federal Rules of Bankruptcy Procedure to object to the Debtor's
6 discharge through and including May 5, 2021.

7 **STIPULATION**

8 NOW, THEREFORE, the parties agree as follows:

9 1. With regard to any complaints that would have to be filed by the Trustee in
10 conformity with Bankruptcy Code Section 727 (11 U.S.C. § 727) and Rule 4004 of the Federal
11 Rules of Bankruptcy Procedure (i.e., discharge of debt) shall be extended for approximately 37 days
12 from the current deadline of May 5, 2021 through and including June 11, 2021.

13 2. The parties further agree that the new deadline, June 11, 2021, may be further
14 extended by stipulation of the parties.

15 3. The parties agree to entry of an order in the form annexed hereto as **Exhibit A**.

16 DATED: April 19, 2021

RINCON LAW LLP

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18 By: /s/ Gregg S. Kleiner

19 GREGG S. KLEINER

20 Counsel for FRED HJELMESET,
21 Trustee in Bankruptcy

22 DATED: April 21, 2021

FINESTONE HAYES LLP

23
24 By: Stephen D. Finestone

25 STEPHEN D. FINESTONE

26 Counsel for Debtor, EVANDER FRANK KANE
27
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11 NORTHERN DISTRICT OF CALIFORNIA
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13 In re

14 EVANDER FRANK KANE,
15 Debtor.

Case No. 21-50028 SLJ
Chapter 7
Hon. Stephen L. Johnson

SECOND ORDER EXTENDING DATE
FOR FILING COMPLAINT OBJECTING
TO DISCHARGE
(11 U.S.C. SECTION 727)

16
17 Based on the Second Stipulation to Entry of Order Extending Date for Filing Complaint (11
18 U.S.C. Section 727) (the "Stipulation") entered into by and between Fred Hjelmset, Trustee in
19 Bankruptcy of the Debtor's estate and Debtor Evander Frank Kane, through their respective counsel,
20 electronically filed on April ____, 2021, as Docket No. ____,

21 IT IS HEREBY ORDERED, as follows:

- 22 1. The Stipulation is approved.
- 23 2. With regard to the Trustee, the current deadline established by Rule 4004 of the
24 Federal Rules of Bankruptcy Procedure to object to the Debtor's discharge is hereby extended
25 through and including June 11, 2021.

26 *** **END OF ORDER** ***
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EXHIBIT A

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*** *COURT SERVICE LIST* ***

No Court service required.